

IN The United States District Court  
of the  
Northern District of Ohio

FILED  
JUL 08 2019  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

1:19 CV 01545

1) Thomas J. Savoca  
plaintiff

JUDGE LIOI  
MAG. # JUDGE LIMBERT

v.  
2) Defendant

- 1) United States Department of Justice
- 2) Executive Office of the United States Attorney's
- 3) Federal Bureau of Investigation

3) (Jurisdiction)

The District Court has jurisdiction pursuant  
to 28 USC 1331 and 1343

4) (Facts)

- A. On 8-20-2003 plaintiff Thomas J. Savoca was indicted. The Districts U.S. Attorney's office has failed to turnover All evidence. At trial Mr. Savoca has seen the evidence. Mr. Savoca was indicted in West Virginia, (Charleston) for Bank Robberies.
- B. On 9-11-2003 F.B.I agent Scott Wilson from Cleveland, Ohio; Jack Remally F.B.I. of Charleston West Virginia obtained DNA swabs from plaintiff Savoca while incarcerated at South regional jail (WV).
- C) On 9-16-2003 Mr Savoca was indicted in Ohio for Bank Robbery also during plaintiffs criminal proceedings the U.S. Attorney's office has failed to turn over All evidence at trial once again, plaintiff was ambushed and surprised by the evidence, Mr. Savoca never recieved his discovery regarding the indictment.  
See Exhibit Affidavit by Plaintiff Thomas J. Savoca EX-2.

0 On 8-20-2003 and on 9-16-2003 the government has failed to produce the plaintiff and have withheld All Evidence that Mr. Savoca is intitled for review to determine his fate, and also to determine what is best regarding his defense, but was never given the opportunity due to the government withholding All discovery materials.



## (Claims)

5.)

- E. On 8-20-2003 when the plaintiff was indicted the "U.S. Attorneys office of West Virginia was obligated to turnover all evidence, and the U.S. Attorney's failed to do so.
- F. The Attorney's office by failing to handover All discovery during the indictment of this proceedings in West Virginia Violated plaintiff's rights under Due process (Fifth Admendment)
- G. On 9-11-2003 when FBI agent Scott Wilson and Jack Remally, obtained DNA swabs, these agents fabricated Evidence under Due process (5th and 14th) admendments violation.
- H. ON 9-16-2003, plaintiff was indicted in Ohio, for Bank robbery. Also during the plaintiffs criminal preceedings the U.S. Attorney's office, failed once again to provide the plaintiff with all Discovery The plaintiff asserts that when he proceeded to trial, it was the first time plaintiff saw the evidence the U.S. government had against plaintiff.

By the U.S. government failing to provide plaintiff with all Evidence it violated plaintiff Due process (5th and 14th) right under the U.S. constitution.

6. (Relief)

1) The plaintiff respectfully request the Court to order All agencies, employees, U.S. employees, State agents, to provide and handover All Evidence that Plaintiff seeks are;

1) F.B.I agent Jack Remally

Reports (All) regarding interviews with All witnesses and bank employees of Trader Bank on July 26, 2003

2) Ripley West Virginia, Police who responded to Trader Bank plaintiff seeks, from 1st responders. July 26 2003  
EX. 3

A. Actual Video surveillance of July 26, 2003 from Traders Bank,

B. Headquarters of Traders Bank, Spencer West Virginia, I seek Video Surveillance, from Headquarter see EX 4

3) I want the following Evidence from F.B.I Cleveland, Ohio

A Application search warrant

B. 302 forms on or about September 11, 2003. from co-defendant residence, 2 mask 1 shot gun see EX 2 Affidavit, EX 5, 18 pgs DOJ. Ex. office FBI. agency.



- 4) The plaintiff seeks: 6-21-2003 suppression hearing, Video, Agent Remall testimony under Oath to Video, black & white, till end show blue van, back doors. Ex 6
- 5) The plaintiff has sought the above discovery for 16 years
- 6) The plaintiff respectfully request the Court to compel the FBI, The US Attorney office to produce All discovery the plaintiff seek under 5 USC 552; Fed. R. civ P 34(a)(1); Fed R civ P # 37(a)(2); Penal code section 1054.9 and any additional relief the court deems just or proper.

7) Verification

I plaintiff Thomas J. Savoca have the complaint and the allegations herein is true and correct to the best of my knowledge I declare verify under penalty of perjury, 28 USC 5,174b.

Respectfully Submitted

Thomas J. Savoca

Thomas J. Savoca

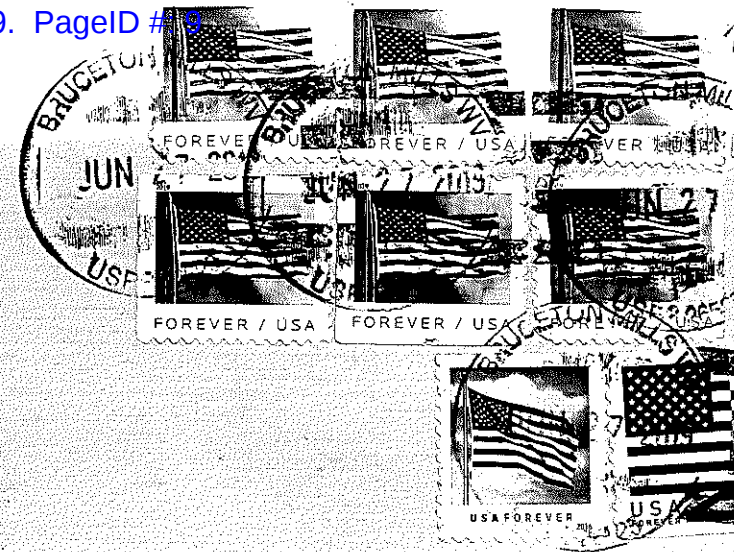
Date June 24, 2019

8) Exhaustion of Remedies

I have exhausted my remedies through the Department of Justice I was denied and appealed the Office of Information policy  
See Attachment (1)



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